

SOUTHERN DISTRICT OF NEW YORK

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JEANINE P. COHEN, :

Plaintiff, :

- against - :

**STIPULATION  
AS TO DEFENDANTS'  
MOTION TO COMPEL  
ARBITRATION**

WESTLAKE FLOORING SERVICES, INC., WEST- :  
LAKE SERVICES, LLC d/b/a WESTLAKE FINANCIAL :  
SERVICES, WESTLAKE FLOORING COMPANY LLC, :  
THE HANKEY GROUP, JONATHAN ZHAN, SVP OF :  
Westlake Flooring Company, LLC, in his corporate and :  
individual capacities, JENNIFER FIORE, Director of Sales :  
& Field Operations at Westlake Flooring Company, LLC, in :  
her corporate and individual capacities, MEGAN FELD- :  
METH, Human Resources Director for Westlake Financial :  
Services, in her individual and corporate capacities, and :  
JOHN DOES 1 through 10, in their individual and corporate :  
capacities, :

Civil Case No.

22-CV-07182-VB

Defendants. :  
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WHEREAS, defendants filed a motion to dismiss or stay the action (the “Motion”) on January 6, 2023 requesting the Court compel plaintiff’s case to arbitration;

WHEREAS, plaintiff’s opposition to the Motion is to be filed/ served on Friday, February 10, 2023;

WHEREAS, counsel for the parties have engaged in good faith efforts to narrow the issues remaining with respect to the Motion;

IT IS HEREBY AGREED TO AND STIPULATED BETWEEN THE PARTIES, THROUGH THEIR COUNSEL, THE UNDERSIGNED, BELOW THAT:

1. This action be stayed while the parties arbitrate this matter;
2. Both plaintiff and defendants will decide in the selection of an arbitrator; and

3. The arbitrator will be selected from either the American Arbitration Association (“AAA”) or JAMS ADR SERVICES (“JAMS”); provided that the arbitration will take place in either Orange, Westchester, Putnam, Dutchess or New York County and/or any other mutually convenient forum.

Date: February 8, 2023  
Cornwall, New York

LAW OFFICES OF JIMMY  
M. SANTOS, PLLC  
*Attorney for Plaintiff*

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**CERTIFICATE OF SERVICE**

This is to certify that on this 8<sup>th</sup> day of February, 2023, a copy of the foregoing was served electronically to:

FORD HARRISON, LLP  
*Attorneys for Defendants*  
*Westlake Flooring Services, Inc., et al*  
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